90 Marple Ave, Villawood:

Pollution Incident Response Management Plan (PIRMP)

sircel

Date Created	20/06/2024	**Latest Update**	8/10/2026	**Owner**	Group Compliance and Risk Manager

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

LICENCE NUMBER: 21820

Approved by: Amanda Muir, Group Compliance & Risk Manager

Date: 15 May 2025

PURPOSE:

Sircel Recycling Pty Ltd has been granted an Environment Protection Licence by the NSW Environment Protection Authority (EPA) for **90 Marple Avenue, Villawood NSW**. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan was developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009.

Licensees should also refer to the EPA's *Guideline: Pollution incident response management plans*.

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Table of Contents

1 Introduction 4
1.1 Environment Protection Licence (EPL) Details 4
2 Pollution Incident – Person Responsible 5
3 Notification of Relevant Authorities 6
4 Notification of Neighbours and the Local Community 7
4.1 Premises in the Immediate Vicinity 7
4.2 Procedure of Informing Neighbours 7
5 Hazards at the Site 8
5.1 Description of Hazards 8
5.2 Likelihood of Hazards 8
5.3 Pre-emptive Actions to be Taken 9
5.4 Inventory of Pollutants 10
5.5 Liquid Waste Storage 11
5.5.1 Location of Minor Storage 11
5.5.2 Operations 11
5.5.3 Control of Ignition Sources (Flammable Liquids Only) 12
5.5.4 Spillage Control 12
5.5.5 Fire Protection and Warning Signs 12
5.6 Safety Equipment 12
6 Communicating with Neighbours and the Local Community 13
7 Minimising Harm to Persons on the Premises 13
8 Maps 14
9 In the Event of a Pollution Incident 22
9.1 Actions to be Taken During or Immediately After a Pollution Incident 22
9.2 Coordinating Person 24
10 Reducing Risk 24
10.1 Staff Training 25
10.2 Testing and Updating of the PIRMP 25
10.3 Test Record 26
11 Related Documents 27

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12 Change Table 27

1 Introduction

1.1 Environment Protection Licence (EPL) Details

Name of licensee: (including ABN)	Sircel Recycling Pty Ltd ABN: 23 644 020 280
EPL number:	21820
Premises name and address:	90 Marple Avenue Villawood NSW 2163
Company or business contact details:	Email: info@sircel.com Call: 1300 439 278
Website address:	https://sircel.com/
Scheduled activity/activities on EPL:	• Resource recovery • Waste storage
Fee-based activity/activities on EPL:	• Non-thermal treatment of general waste • Recovery of general waste • Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste • Waste storage – other types of waste

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2 Pollution Incident – Person Responsible

Held internally by Sircel.

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3 Notification of Relevant Authorities

Relent authorities include:

1. Fire & Rescue NSW and/or Rural Fire Service as applicable – 000 (first notification)
2. *EPA – 131 555*
3. *NSW Health (nearest public health unit)*

See www.health.nsw.gov.au/Infectious/Pages/phus.aspx for local contact details.

4. *SafeWork NSW – 131 050*
5. *Local authority (usually the local council) in which the pollution has occurred.*

Authority	**Contact numbers**	**Priority**
Fire & Rescue NSW Chester Hill Fire and Rescue 163 Waldron Rd, Chester NSW 2162	**In an emergency: 000** Chester Hill Fire Station: 02 9493 1085	**First notification**
EPA	**131 555**	**Second notification**
NSW Health, Relevant Area Health Service Liverpool Public Health Unit (South Western Sydney LHD) P.O. Box 38, Liverpool BC NSW 1871	Phone: 02 9794 0855 Fax: 02 9794 0838 (secure) **After hours** Phone: 02 8738 3000 (Liverpool Hospital) - ask for Public Health Officer on call	Subsequent notification if required
SafeWork NSW	131 050	Subsequent notification if required
Local authority/s Canterbury-Bankstown Council	02 9707 9000 Email: council@cbcity.nsw.gov.au	Subsequent notification if required
Any other identified organisation or agency requiring notification (if applicable) e.g. Sydney Water, Department of Planning Industry and Environment, Roads and Maritime Services	N/A	N/A

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4 Notification of Neighbours and the Local Community

4.1 Premises in the Immediate Vicinity

Properties within 50m of the development

Industrial neighbours:

- 60 Marple Avenue Villawood
- 70 Marple Ave Villawood
- 61 Marple Avenue Villawood

Sensitive receivers, being residential premises:

- 89-119 Biloela St Villawood

4.2 Procedure of Informing Neighbours

Where community notification is required following a pollution incident on site or involving trackable waste, this will usually be led by the incident controller from emergency services (NSW Police Force or Fire & Rescue NSW). Sircel will consult with the incident controller on what community notification, if any, should be undertaken.

Public community consultation will be the responsibility of Sircel.

If required, the immediate neighbours will be contacted via doorknock or telephone. The nature of the incident and any health or environmental risks will be explained.

- Sircel staff conducting door knocking or telephone calls should be the most senior available person/s not actively engaged in responding to the incident, as directed by the Site Manager or Chief Warden.
- Sircel staff conducting door knocking are to identify themselves as being a company representative of Sircel at 90 Marple Avenue.

In the event of a major pollution incident residents and businesses will be further contacted by an emergency service representative.

An ‘all clear’ door knock or telephone call will be made once there is no longer any concern.

If required, the wider community will be notified via local media in consultation with the EPA, Council and emergency services.

The Sircel Marketing Director is to be notified of all public consultation and notification activities as soon as reasonably practicable.

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5 Hazards at the Site

5.1 Description of Hazards

Table 1: Description of Hazards

Hazard	Impact on Human Health and/or Environment
Air emission	Airbourne emissions causing health impacts.
Contamination	Damage to environment should any contaminated materials enter waterways.
Wastewater runoff	Ingress to stormwater infrastructure and potential contamination of waterways.
Noise emission	Disturbance of natural environment. Disturbance to neighbouring business' staff and operations.
Storage of waste materials	Land and water pollution with leachate.
Spill/leak	Spill that reaches a drain, sewer or natural watercourse. Spills are a hazard for staff.
Fire	Injury or death. Damage to property. Damage to natural environment.

5.2 Likelihood of Hazards

Table 2: Likelihood of Hazards

Hazard	Likelihood	Conditions or Events that may increase likelihood
Air emission	Low	Lack of site maintenance. Dust extraction system not working.
Contamination	Medium	Lack of inspection protocols for incoming waste. Lack of proper storage measures
Wastewater runoff	Low	Hazardous materials exposed to stormwater.

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Noise emission	Low	Excessive additional noise, particularly outdoors or at evening / night time hours. Unnecessary truck idling, reversing or use of truck horns.
Storage of waste materials	Low	Improper storage of waste batteries leading to potential fire. Improper storage of liquid waste leading to potential discharge to environment. Improper storage of hazardous waste leading to potential leachate generation or health hazard.
Spill/leak	Low	Improper storage of liquid waste leading to potential discharge to environment. Improper storage of hazardous waste leading to potential leachate generation or health hazard.
Fire	Medium	Lack of maintenance of equipment and machinery. Improper storage of batteries. Improper storage of combustible waste.

5.3 Pre-emptive Actions to be Taken

Plant inspection and maintenance

Plant and equipment will be inspected on a regular basis to ensure:

- Integrity of plant;
- Functionality of processing components; and
- Functionality of connections.

A supervised trial will be undertaken to ensure the plant and equipment are working properly.

Plant and equipment will be maintained on a regular basis in accordance with the manufacturer's recommendations.

Training

Induction, operation, and ongoing training to be provided to staff.

PPE

Floor staff and machinery operators to wear PPE at all times during shift.

Documents

The following must be available at the site of the plant at all times:

- A copy of this PIRMP must be kept with the plant or the immediate operator at all times;

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- A copy of the environment protection licence; and
- A spill kit that is appropriate for the type of waste being processed.

Monitoring records must be in accordance with the licence conditions (EPL 21820) and kept for a minimum of 4 years.

Pollution complaints must be recorded in accordance with licence conditions and kept for at least 4 years. The record must be produced to any authorised officer of the EPA who asks to see them.

5.4 Inventory of Pollutants

Substance	Dangerous Goods Classification	Maximum Quantity	Storage of Materials
Lithium-Ion Batteries Lithium Metal Batteries	Class 9 (Misc. dangerous goods) PGII	5 tonnes	Stored away from strong acids and bases. Triaged and temporarily stored in purpose designed container. Separated from combustible materials and activity areas, labelled and sealed in a fireproof container.
Lead acid Batteries Alkaline Batteries Ni-Cad Batteries NiMh Batteries	Class 8 corrosive substance PGIII		
Processed electronic waste containing lead	Lead Compounds, soluble, not otherwise specified 6.1 Toxic substances	Within 1,000 tonnes limit of waste permitted on site at any one time	Stored in Bulka bags in dedicated area.
Processed electronic waste containing nickel	Class 5.1 Oxidising Substances or Class 6.1 Toxic substances	Within 1,000 tonnes limit of waste permitted on site at any one time	Stored in Bulka bags in dedicated area.
Waste ink, dye, pigment, paint, lacquer & varnish	Nil	5 tonnes	Cartridges will be stored within a leakproof container.
Cathode ray tubes	Nil	1 tonne	Stored in a cardboard pallet box. Processed CRT glass is not permitted.

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Dust resulting from e-waste processing	Nil	15 tonnes	Captured by dust extraction system and stored in Bulka bags in dedicated area.

5.5 Liquid Waste Storage

Liquid waste would arrive encapsulated in other elements of the e-waste, such as printer cartridges. Quantities of ink would therefore be low. Inks remain in the cartridges throughout the storage of materials and therefore have minimal potential for spontaneous combustion, vapour emissions or spills and leaks. Cartridges will be stored within a leakproof container which is located in the sort area before being shipped to downstream processor.

In accordance with the AS1940 the following measures would apply:

5.5.1 Location of Minor Storage

The following requirements and recommendations apply to the location of an indoor minor storage:

(a) [N/A] If the storage is located on a floor that is above the building's lowest floor (i.e. on a floor that is above the ground floor or basement), its location shall not jeopardise the safety of any areas on lower levels of the building or impede firefighting operations.
(b) [N/A] Flammable vapours and spilt liquids shall be prevented from escaping to any lower levels of the building.
(c) Concentrated storage of liquids in any one area shall be avoided, so as to reduce the fire load and the potential rate of fire spread.
(d) The storage area shall be adequately ventilated.
(e) The build-up of flammable vapours should be avoided.

5.5.2 Operations

The following handling requirements and precautions apply:

(a) Persons who handle the liquids shall be fully aware of the hazards involved.
(b) All storage areas shall be secured against access by unauthorised persons at all times.
(c) Packages shall not be placed where they could hinder escape from a building in an emergency.
(d) Care will be taken when decanting or transferring flammable liquids.
(e) Packages shall be kept closed when not in use. Packages containing flammable liquids should only be opened or decanted in well-ventilated areas and away from any potential ignition source.
(f) The area in or around the minor storage shall be kept free of combustible materials and residues.
(g) Any materials that might react dangerously if mixed shall be kept apart so that the possibility of reaction is minimised, e.g., fuel and pool chlorine.
(h) Liquids should not be stored near any hot surfaces (e.g. steam pipes, furnace walls or engines) or where they might be accidentally exposed to heat (e.g. from escaping steam).
(i) Liquids shall be transferred and moved in a manner that reduces the likelihood of spillage, vapour escape or fire.

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5.5.3 Control of Ignition Sources (Flammable Liquids Only)

Note: N/A as volumes of liquids are not exceeded, however:

There shall be no uncontrolled sources of ignition in any space in which a flammable mixture of vapour and air could be present.

5.5.4 Spillage Control

All spills and leaks shall be cleaned up immediately. Any waste shall be disposed of safely and in accordance with the local regulations. Liquids shall not be allowed to reach ignition sources, stores of other chemicals, or combustible materials (e.g. timber and paper), or flow into drains or onto neighbouring land, or enter any creek, pond or waterway. Precautions should be based at least on the loss of contents of the largest container kept.

A simple spill-response kit may consist of:

(a) A readily identifiable, suitable container with a lid or cover containing absorbent materials;
(b) Suitable personal protective equipment; and
(c) Suitable equipment required for spill clean-up.

5.5.5 Fire Protection and Warning Signs

Note: N/A as less than 100L of flammable liquid would be stored and less than 1000L of combustible liquid will be stored, however:

(a) At least one portable fire extinguisher, having a suitable rating for use with the range of materials being kept, shall be readily accessible and adjacent to the minor storage area.
(b) In areas where flammable liquids are decanted, a sign bearing the words shall be displayed:

DANGER – FLAMMABLE LIQUID – NO SMOKING – KEEP FIRE AWAY

(c) A flammable liquid storage cabinet will be used to store decanted or transferred flammable liquids (if applicable).

5.6 Safety Equipment

Safety equipment on the premises includes:

- Fire suppression system – automated sprinklers
- Fire extinguishers and fire hose reels
- Fire hydrant at multiple access points around the site
- Fire detection and alarm systems
- Spill kits
- Dust filtration and air emissions monitoring
- Battery storage in fire-proof containment.

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6 Communicating with Neighbours and the Local Community

Notification of Works

If works are to be carried out, neighbours will be notified regarding the nature of works, potential disturbances, and approximate timeframe.

Complaints Register

A complaints phone contact is available to members of the public.

A register of complaints, complainants, and corrective activities will be kept and updated by Sircel.

Specific Information

Should any potential disruption be anticipated, the community would be informed through signage, and/or online posting, and/or individual communications.

Any pollution incidents that pose a risk to the immediate vicinity will require contact to local authorities, emergency services, and neighbouring properties.

7 Minimising Harm to Persons on the Premises

Training

All staff to undergo site induction and ongoing training.

All staff to participate in annual evacuation drill.

PPE

Staff are to be provided with the following PPE, as needed:

- Overalls
- Gloves
- Hard hat
- Boots
- Respiratory protection
- Hearing protection
- Eye protection
- High visibility

Health Monitoring

Staff who are potentially exposed to lead and nickel will be provided with health monitoring.

Provision of Hygiene

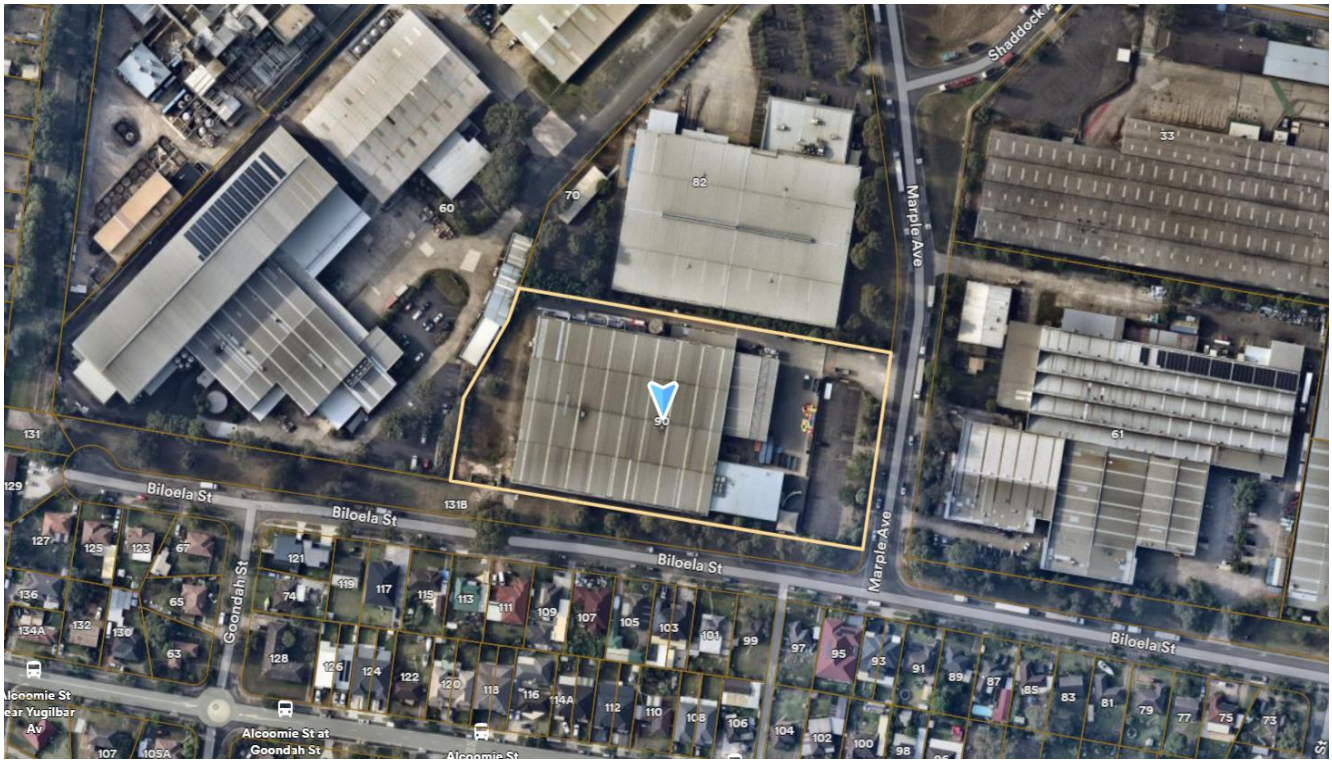
Staff working with toxic substances are to be provided with facilities for washing and changing.

Areas for food consumption will be separated from process and materials storage areas.

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8 Maps

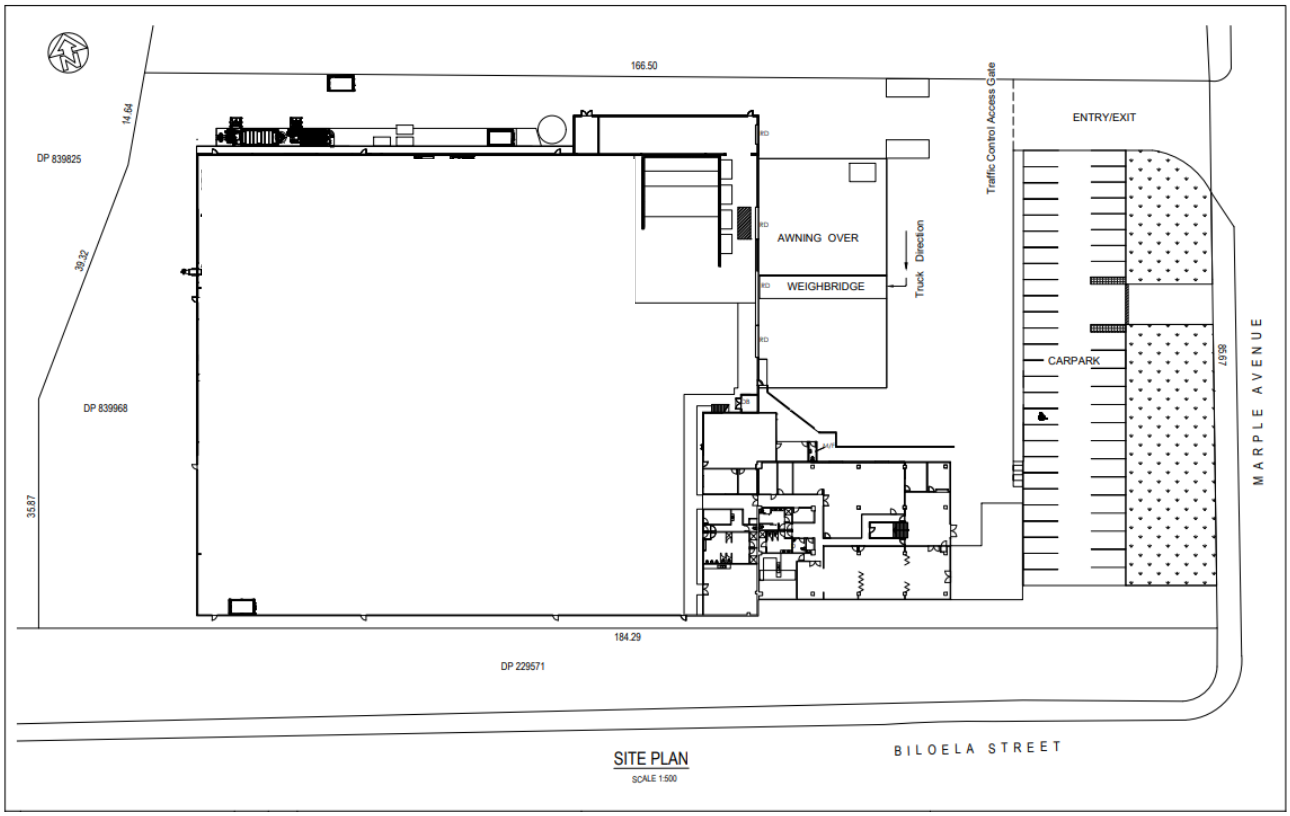
Figure 1: Site and surrounds



Source: Nearmap, 2024.

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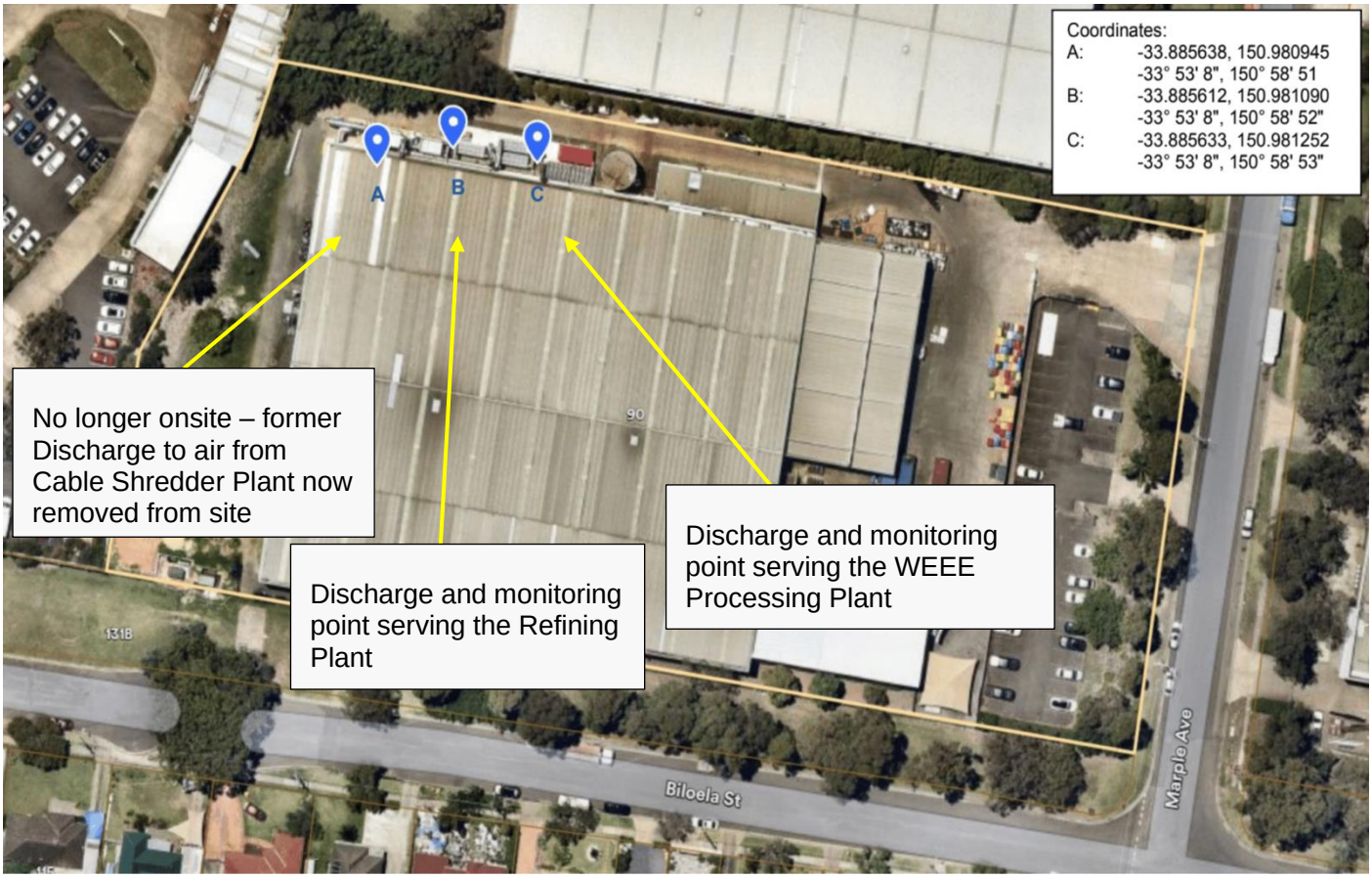
Figure 2: Site Layout



Source: Sircel, 2025.

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Figure 3: Map of emissions and monitoring points

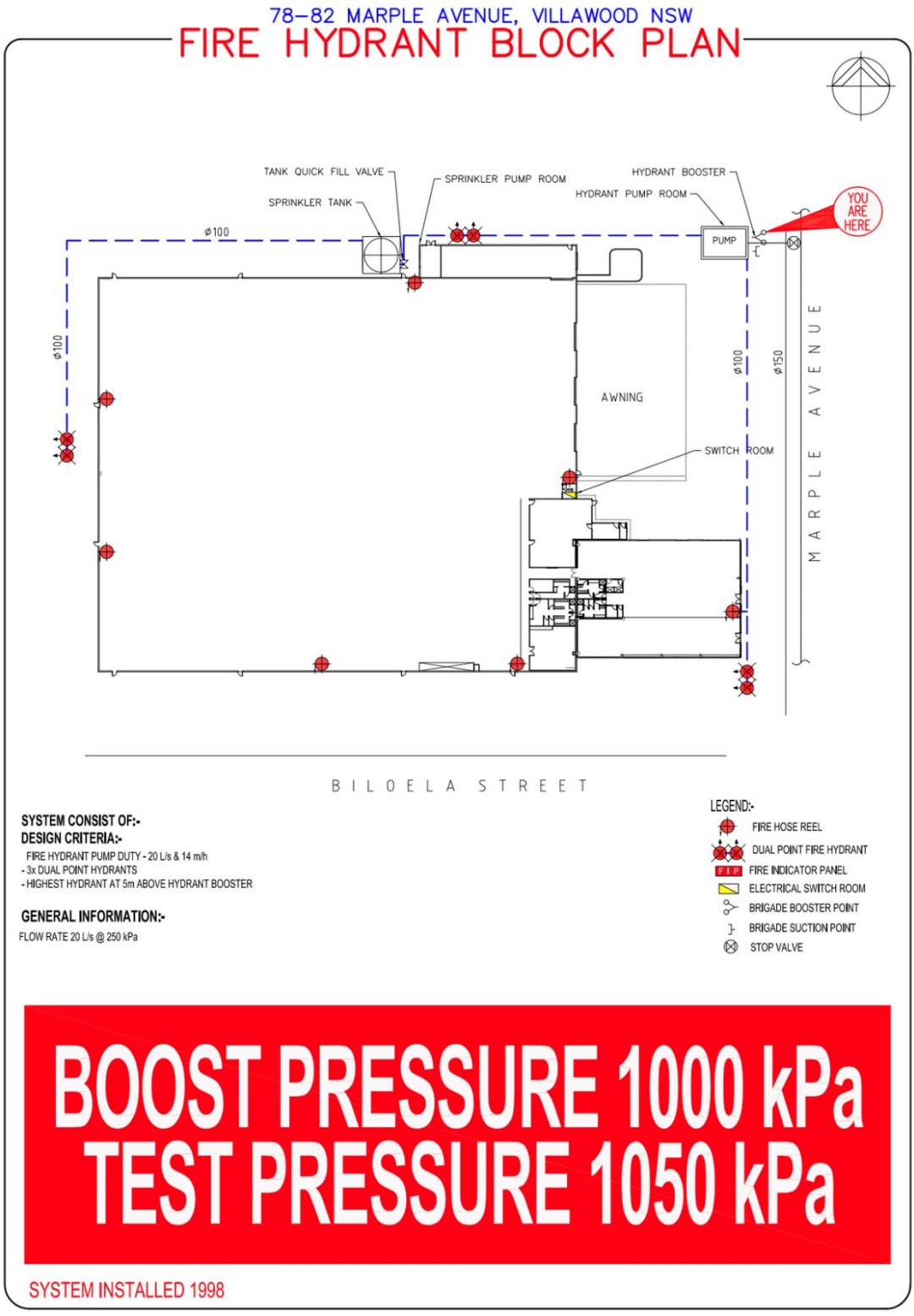


Source: Nearmap, 2024.

NB: Point A indicates former discharge to air from Cable Shredder Plant. This plant has since been removed from site. There is no discharge in this area.

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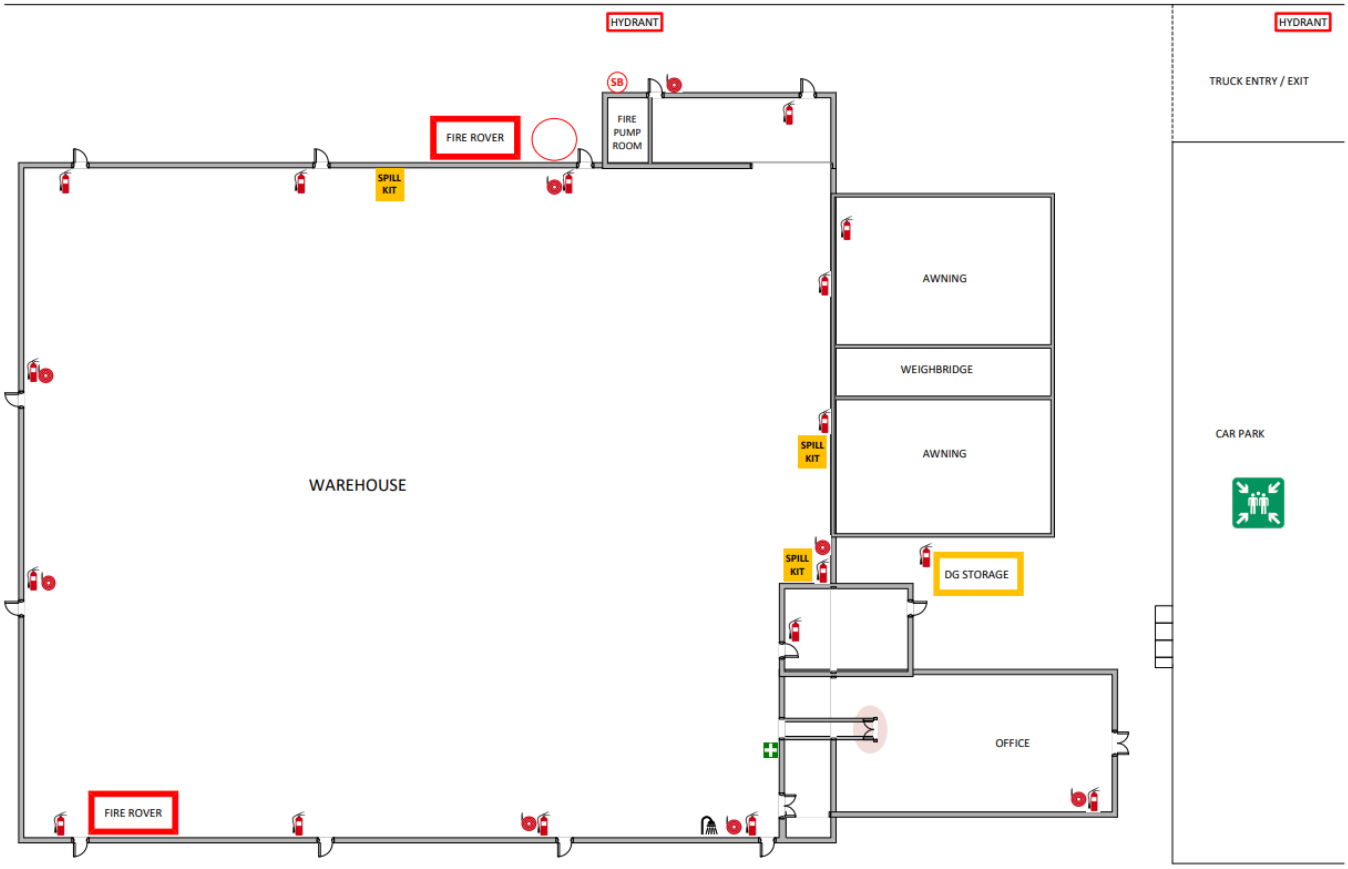
Figure 4: Fire hydrant plan



Source: Sircel 2023

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Figure 5: Emergency equipment



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Figure 6: Stormwater map

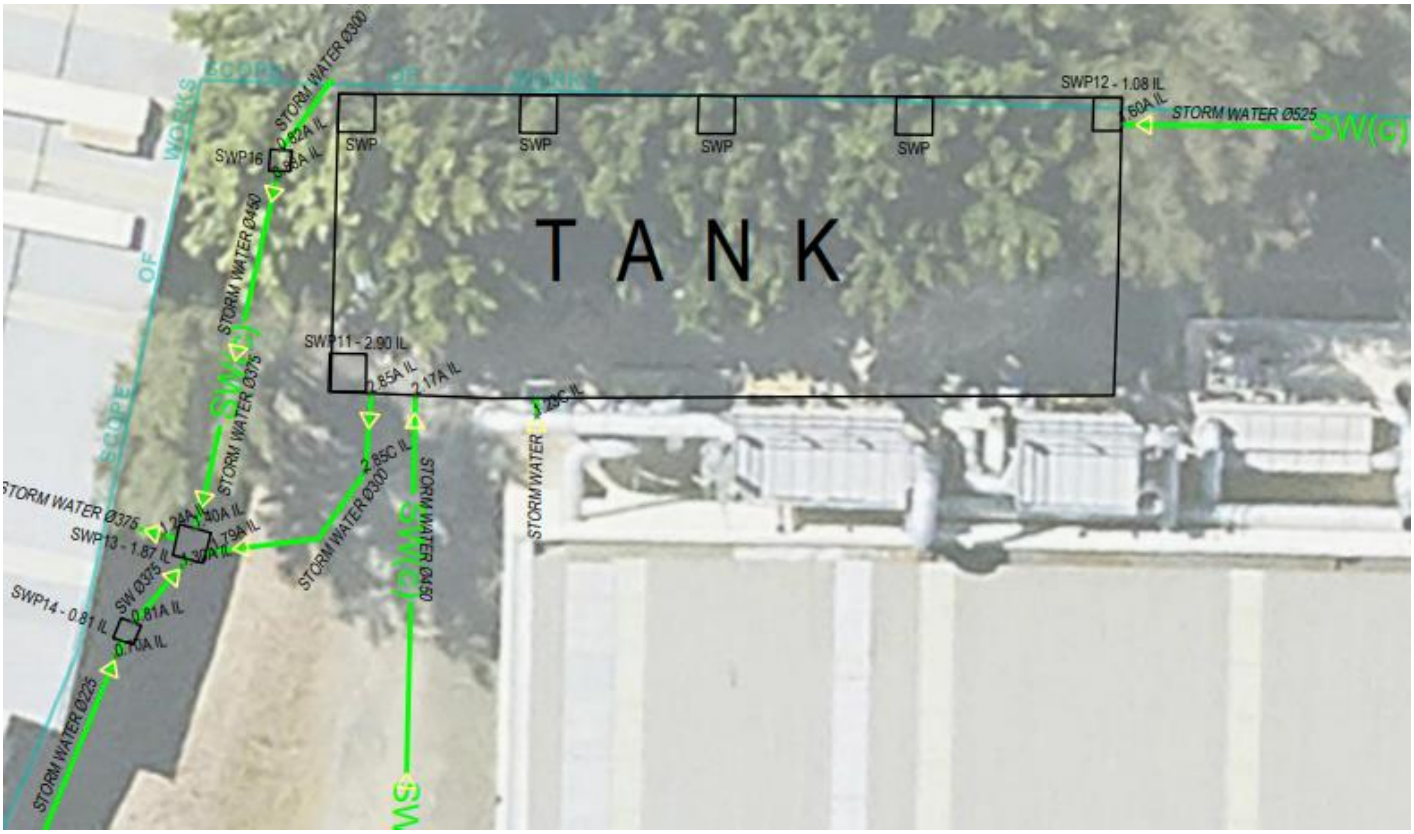
All stormwater sitewide flows to a pit the rear of site, which drains to Prospect Creek. See detail next page.



Drains marked in red have mesh guards fitted. Drains marked in blue have drain wardens fitted.

Source: Geoscope 2025

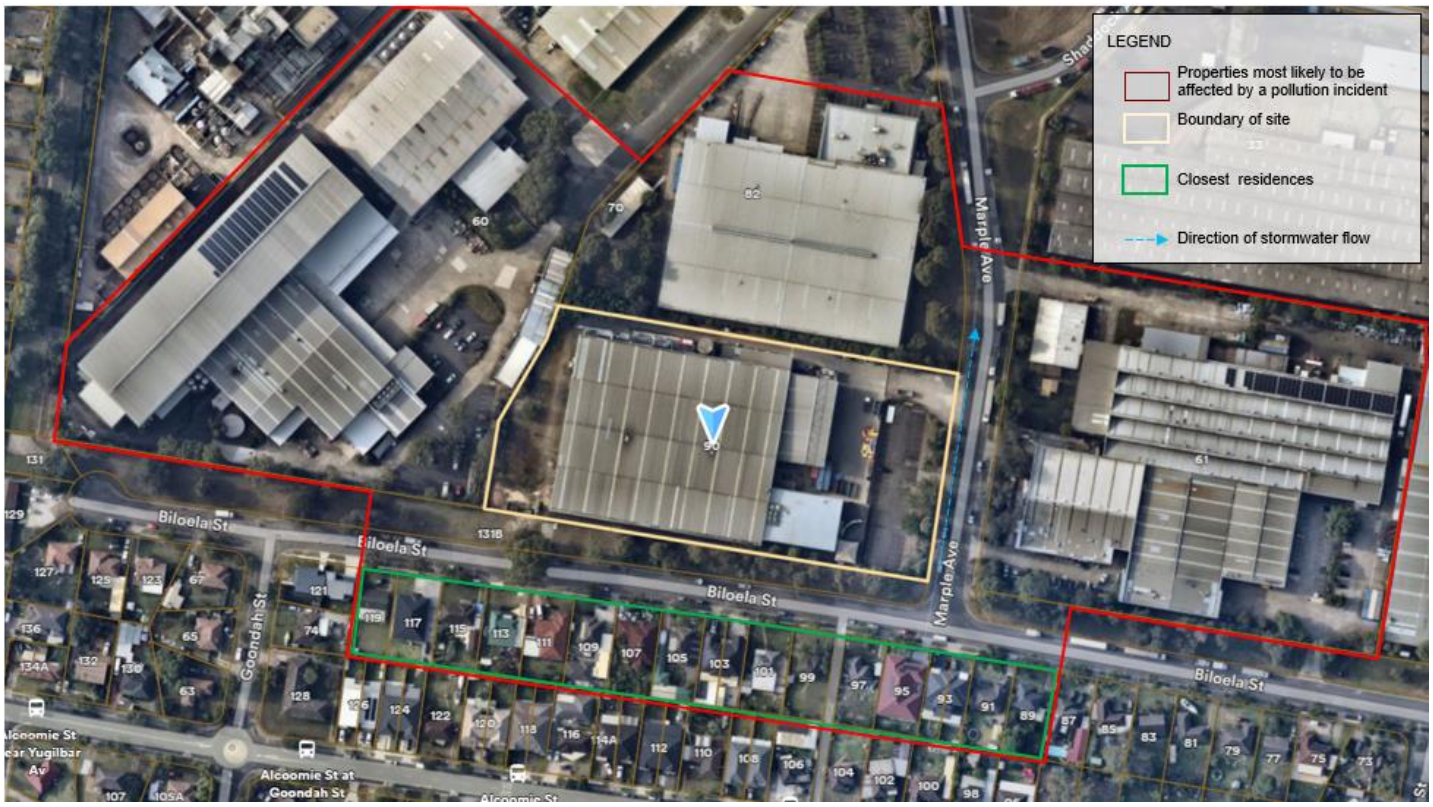
Figure 7: Stormwater map – detail



There is no valve on the tank outlet.
Source: Geoscope 2025

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Figure 8: Surrounding area likely to be affected by a pollution incident



Source: NearMap 2024

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9 In the Event of a Pollution Incident

9.1 Actions to be Taken During or Immediately After a Pollution Incident

1. Assessment of Incident

- The shift supervisor or relevant member of staff will undertake an initial assessment to determine the scale and severity of the pollution incident.
- If the incident is small scale, does not involve hazardous materials (such as chemicals) and can be managed internally within the site, relevant protocols for management will be undertaken (proceed to **Manage Incident** below).
- If the incident involves potentially hazardous materials, reaches stormwater drainage pits, extends beyond the site shed, or is of a scale incapable of management, evacuation of the site, notification of neighbours (if necessary), and contact with relevant emergency services and authorities will be made.
- MP-VIL-1.8.02 Villawood Emergency Response Management Plan (ERMP) will be activated by the Site Chief Warden, where required.

2. Evacuation Procedures

- All staff on site will be evacuated to the emergency meeting point as noted in Figure 5.
- All site works will be stopped until the incident has been resolved.
- Provide first aid (if necessary).

3. Contact with Emergency Services/Relevant Authority/Neighbouring property

- Contact emergency services (000) if not already contacted
- If any risk to neighbours, contact through doorknock or telephone
- Contact the NSW EPA (131500)
- Contact Safe Work NSW (131 055)
- Contact Local Council (Canterbury-Bankstown Council): Phone: 9707 9000
- Fire and Rescue (general enquiries – non-emergency): 1300 729 579
- Contact NSW Health Public Health Unit (1300 066 055)
- Contact Local Health Unit Liverpool (Liverpool Hospital): (02) 8738 3000 (after hours) – ask for Public Health Officer on call.

4. Manage Incident

- The site Emergency Response Team (ERT) will coordinate the response to the incident.
- ERT to liaise with site supervisor
- Implement communication protocols
- Inform and liaise with stakeholders

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5. Deploy Controls

- Site supervisor to implement controls and risk mitigation (at direction of authorities/emergency services if attending)
- Consider safety and minimisation of further harm when coordinating pollution response
- Use available safety equipment and PPE
- Isolate and control point sources of pollution
- Turn off processes and equipment that could contribute to further harm
- Remove materials that could contribute to incident, e.g., flammable materials, harmful chemicals, etc
- Review Safety Data Sheets (SDS) for spilt substances
- Use the spill kit to clean up spills
- Use fire suppression equipment to control fire

6. Return to Normal

- ERT to identify business recovery requirements
- Appoint management staff to recovery coordinator if necessary
- Return to normal business operations
- Advise stakeholders of return to normal operation conditions or alternatives

7. Investigation of Incident

- ERT to implement incident reporting and investigation procedures
- Prepare incident report
- Conduct debrief with site staff and management

8. Implement corrective actions **Corrective Actions**

- Review progress with corrective actions
- Update risk assessment
- Review PIRMP and other site documentation such as site Environmental Management Plan, ERMP and related procedures and update as required
- Continue implementation of corrective actions as necessary
- Review progress on ongoing basis

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9.2 Coordinating Person

The Site Manager will identify the procedures to be followed for coordinating with the authorities or persons who have been notified.

10 Reducing Risk

Training of Staff

- All staff will undergo induction and ongoing training on safe and effective use of machinery onsite.
- Training sessions will be recorded in training register.
- Any observed instance of non-compliant operations will require retraining for the individual(s).

Inspection of Machinery

- Regular inspection of machinery on a daily basis to confirm good working order and identify wear and tear.

Regular Maintenance

- In accordance with the licence (EPL 21820): All plant and equipment installed at the premises or used in connection with the licensed activity:
    - must be maintained in a proper and efficient condition; and
    - must be operated in a proper and efficient manner.

Spill Kits

- Spill kits will be available, maintained, and staff will be trained in their use.
- Stormwater infrastructure will be inspected on a regular basis and maintained, including filters, pipes and drain covers.

Review of management measures

- In the event of a complaint management measures will be reviewed and improved.

PPE

- Staff will have access to, be trained in use, and wear relevant PPE.

Storage

- Storage of materials will be in accordance with the conditions of the licence (EPL 21820)
- Boundaries of areas used for storage must be clearly marked.
- All liquid waste must be stored appropriately, such as in self-contained bunded areas.
- All chemicals must be stored, handled and disposed of in accordance with The Storage and Handling of Flammable and Combustible Liquids (AS 1940-1993).

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- Batteries must be stored undercover in a clearly designated area, separate from other electronic waste materials.

Monitoring

- Pollution monitoring will be in accordance with the conditions of the licence (EPL 21820)
- Noise monitoring is required on a yearly basis
- Air monitoring is required on a yearly basis

10.1 Staff Training

Staff will be trained in the following environmental management procedures:

Table 3: Staff training schedule

Type	Frequency	Documentation	Record keeping
Staff induction	Initial training	Staff induction form	5 years
Toolbox talks	6 months	Dates and attendees will be recorded.	5 years
Pollution incident drill	Yearly	Dates and attendees will be recorded.	5 years
Staff training in incident response	Yearly	Dates and attendees will be recorded.	5 years
Staff training in transport of trackable wastes	Yearly	Dates and attendees will be recorded.	5 years

10.2 Testing and Updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident.

Records – Testing the PIRMP

A record of the testing of this PIRMP will be kept by Sircel Recycling Pty Ltd either in hard or soft copy format, with the documentation details outlined in the FRM-038 Villawood PIRMP Test Record.

Records will be stored in the designated location by Sircel.

Manner of Testing the PIRMP

This PIRMP will be scheduled for testing commencing in the month of May each year and within 1 month of a pollution incident.

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The Group HSE Compliance and Risk Manager and the person responsible for activating the PIRMP will manage the ongoing testing and maintenance of this PIRMP.

Table 4: PIRMP testing schedule and responsibility

Stage	Responsibility	Frequency	Documentation
1. Staff training in incident response	Manager	Yearly	Dates, trainers, and attendees will be recorded.
2. Pollution Incident drill	Manager	Yearly, following 1	Dates, trainers and attendees will be recorded.
3. Documentation of response to drill	Manager	Yearly, following 2	Meeting minutes will record the response to the drill.
4. Identification of shortcoming and improvements	Management team/ Manager	Yearly, following 3	Meeting minutes will record shortcomings and improvements.
5. Modification of the PIRMP	Management team	Yearly, following 4	Plan will be updated and new document revision number will be assigned.

10.3 Test Record

After each test this PIRMP will be updated to show the test date and name of the person who carried it out.

Table 5: PIRMP testing record

Test date	Test type	Test conducted by
Example: Dd / mm / yyyy	*Annual*	*R Person*
14/05/2025	Annual - desktop	Held internally by Sircel.
17/07/2025	Practical exercise	Held internally by Sircel.

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11 Related Documents

FRM-038 Villawood PIRMP Test Record

MP-VIL-1.8.02 Villawood Emergency Response Management Plan

MP-VIL-1.8.04 Villawood – Environmental Management Plan

12 Change Table

Revision no	Release Date	Revision status	Approved by	Description of change
REV00	August 2024	Approved	A Muir	Initial Release of draft document
REV01	April 2025	Approved	A Muir	Updated for solar panels, stormwater map, emergency equipment map, alignment with related documents, test schedule record. Public version prepared.
REV01.1	May 2025	Approved	A Muir	Updated names for Person Responsible for PIRMP activation and alternative contact
REV01.2	May 2025	Approved	A Muir	Modifications identified during test exercise
REV02	Oct 2026	Approved	A Muir	Updated names for Person Responsible for PIRMP activation, alternative contact and Sircel Refining contacts. Updated stormwater diagram and site emergency equipment diagram (minor edits). Added reference to site stormwater plan.

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